

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	Chapter 11
KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Debtor.</i>	§	Case No. 20-50805

KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Adversary No. 20-05027
DMA Properties, Inc., et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

**DECLARATION OF LOURDES ORTIZ IN SUPPORT OF DMA’S MOTION
FOR SUBSTITUTE SERVICE**

My name is Maria de Lourdes (“Lulú”) Ortiz. I am one of the Counsel for DMA Properties, Inc. and Frank Daniel Moore (collectively, “DMA”) and Longbranch Energy, LP (“Longbranch”). I am over the age of 18, have never been convicted of a felony, and am of sound mind and capable of making this sworn statement. My date of birth is July 5, 1993, and my mailing address is 303 Camp Craft Road, Suite 325, Austin, TX 78746. The facts stated in this declaration are based on my personal knowledge, or if based upon information and belief, I believe them to be true and correct. If called upon to do so, I could and would testify competently to the statements set forth herein.

1. **Exhibit A** is a true and correct copy of the Writs of Execution to the United States Marshal issued by this Court against KrisJenn Ranch, LLC; KrisJenn Ranch, LLC Series Uvalde Ranch; and KrisJenn Ranch, LLC, Series Pipeline ROW (together, “KrisJenn”); and Larry Wright (“Wright”).

2. **Exhibit B** is a true and correct copy of Form USM-285, Process Receipt and Return from the U.S. Marshal's Office, dated September 26, 2024, regarding service for KrisJenn and Wright.

3. **Exhibit C** is a true and correct copy of DMA and Longbranch's Joint Postjudgment Discovery Requests to Wright and KrisJenn.

4. **Exhibit D** is a true and correct copy of KrisJenn Ranch, LLC's Answers to DMA and Longbranch's Postjudgment Interrogatories.

5. **Exhibit E** is a true and correct copy of KrisJenn Ranch, LLC Series Uvalde Ranch's Answers to DMA and Longbranch's Postjudgment Interrogatories.

6. **Exhibit F** is a true and correct copy of KrisJenn Ranch, LLC, Series Pipeline ROW's Answers to DMA and Longbranch's Postjudgment Interrogatories.

7. **Exhibit G** is a true and correct copy of Larry Wright's Answers to DMA and Longbranch's Postjudgment Interrogatories.

8. **Exhibit H** is a true and correct copy of Form USM-285, Process Receipt and Return from the U.S. Marshal's Office, dated April 23, 2025, regarding service for KrisJenn and Wright.

9. **Exhibit I** is a true and correct copy of renewed Writs of Execution to the United States Marshal issued by this Court against KrisJenn and Wright.

10. On September 26, 2024, DMA and Longbranch requested writs of execution to the United States Marshal to enforce the Court's judgment against Wright and KrisJenn from the Clerk of Court. That same day, the Clerk of Court issued writs of execution against KrisJenn and Wright, *see* **Exhibit A**, and DMA and Longbranch delivered the writs of execution to the United States Marshal's Office for service. *See* **Exhibit B**.

11. Between September 26 and October 16, 2024, the U.S. Marshal's Office made multiple attempts to serve Wright and KrisJenn with the writs of execution at their last known addresses, 733 Admiral Benbow Lane, McQueeney, TX 78123, and 410

Spyglass Road, McQueeney, TX 78123. On October 16, the U.S. Marshal's Office informed DMA and Longbranch that the San Antonio office had been unable to locate Wright or KrisJenn after multiple attempts at either of the addresses.

12. In light of the difficulties in locating Wright and KrisJenn to enforce the judgment, on October 23 DMA and Longbranch served a set of Joint Postjudgment Discovery Requests on KrisJenn and Wright to identify, among other things, the current owner of the ROW and an alternative location for service of the writ of execution. *See Exhibit C.*

13. On December 6, KrisJenn and Wright served their Answers to DMA and Longbranch's Interrogatories. *See Exhibit D–G.*

14. According to KrisJenn's responses to DMA and Longbranch's discovery responses, none of the KrisJenn entities (nor anyone on their behalf) own, hold title, possess, or otherwise have an interest in the ROW. *See, e.g., Exhibit D* at Interrogatories 3–5, 17–19, 25–27, 41–43.

15. Wright refused to respond to most of DMA and Longbranch's discovery requests, other than to serve objections. In his objections, Wright incorrectly claims that no judgment exists against him in his individual capacity. *See, e.g., Exhibit G* at Interrogatory 2. The Court has since confirmed that its Order Awarding Fees is a judgment against Wright.

16. On December 2, 2024, DMA and Longbranch delivered writs of execution to the U.S. Marshal's Office for second attempt at serving the writ of execution at Wright and KrisJenn's last known addresses, 733 Admiral Benbow Lane, McQueeney, TX 78123, and 410 Spyglass Road, McQueeney, TX 78123. *See Exhibit H.* The U.S. Marshal's Office has informed me that, despite multiple service attempts, they were unable to locate Wright or KrisJenn. *Id.*

17. On May 23, 2025, DMA and Longbranch requested renewed writs of execution from the Clerk of Court, which the Court issued on May 27, 2025. DMA now

respectfully requests that the Court allow substitute service or specially appoint a process server to serve these writs of execution on Defendants because Defendants appear to be evading service and have made no effort to satisfy the final judgment awarding \$750,000 to DMA and Longbranch.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 30th day of May 2025 in Travis County, Texas.

/s/ Lulú Ortiz
Lourdes Ortiz